

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. 1:23-CR-00015

vs.

Hon. Hala Y. Jarbou
Chief U.S. District Judge

ARISKNIGHT ARKIN-EVERETT WINFREE,

Defendant.

/

BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY

The United States of America, by and through Assistant United States Attorney Daniel T. McGraw, Assistant United States Attorney, hereby files the following Bill of Particulars for Forfeiture of Property:

1. On February 14, 2023, an Indictment was filed in the Western District of Michigan charging the Defendant with kidnapping, in violation of 18 U.S.C. § 1201(a)(1) (Count 1), coercion and enticement, in violation of 18 U.S.C. § 2422(a) (Count 2), attempted coercion and enticement, in violation of 18 U.S.C. § 2422(a) (Count 3), and sexual exploitation of a minor, in violation of 18 U.S.C. §§ 2251(a), (e) (Counts 4 and 5).

2. The Indictment contained Forfeiture Allegations. The Forfeiture Allegations provided notice to the Defendant that upon conviction of the offenses charged in Count 2-5, the United States would, pursuant to 18 U.S.C. §§ 2253(a), 2428, seek forfeiture of any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offense, any property, real or

personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense, any visual depiction described in 18 U.S.C. § 2251, any matter which contains any such visual depiction that was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110, any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense, any property, real or personal, used or intended to be used to commit or to promote the commission of the offense, and any property traceable to such property, and substitute assets if certain conditions exist under 21 U.S.C. § 853(p).

3. Pursuant to Federal Rule of Criminal Procedure 32.2(a), the United States hereby gives notice to Defendant that, upon conviction of violating 18 U.S.C. §§ 2422(a), 2251(a), (e) as set forth in the Indictment, it will seek to divest through forfeiture proceedings any interest Defendant may now or forever claim to the following property seized by the FBI on or about December 12, 2022, in East Lansing, Michigan:

- a. Asset ID 23-FBI-001283; General Electronics, more specifically described as various cellular phones, video equipment, and computer equipment;
- b. Asset ID 23-FBI-001284; General Electronics, more specifically described as an Apple cellular phone and VanTrue and BlackVue video equipment;
- c. Asset ID 23-FBI-001285; Video Equipment, serial number ending 2367;
- d. Asset ID 23-FBI-001286; various firearms and ammunition; and
- e. Asset ID 23-FBI-001287; various firearms and ammunition.

Respectfully submitted,

MARK A. TOTTEN
United States Attorney

Dated: March 6, 2023

/s/ Daniel T. McGraw
DANIEL T. McGRAW
Assistant United States Attorney
P.O. Box 208
Grand Rapids, MI 49501-0208
(616) 456-2404